

Exhibit F

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Crystal Ollie, as next of friend and mother of one minor child, J.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Crystal Ollie has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.W. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

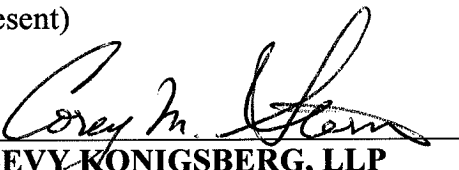
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Crystal Lopp, as next of friend and mother of three minor children, C.L., D.L. and K.L., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Crystal Lopp has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: K.L. – [REDACTED] 2001, D.L. – [REDACTED] 2001, C.L. – [REDACTED] 2012
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

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1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Crystal Law, as next of friend and mother of one minor child, N.T., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Crystal Law has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: N.T. – [REDACTED] 2008
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
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8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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STANDARD FORM 95 (SF-95) REQUIREMENTS


1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Crystal Handley, as next of friend and mother of five minor children, E.F. 1, E.F. 2, E.F. 3, E.F. 4 and T.P, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Crystal Handley has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: E.F.1 – [REDACTED] 2006, E.F.2 – [REDACTED] 2003, E.F.3 – [REDACTED] 2002, E.F.4 – [REDACTED] 2004, T.P. – [REDACTED] 2000
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
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9. Property Damage: None

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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

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ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Creola Ivy, as next of friend and legal guardian of one minor child, D.I., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Creola Ivy has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: D.I. – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
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8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
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- D. Total Damage Claim: 2000000 (at present)
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2. Claimant and Claimant's Representative: Cortney Paige, as next of friend and mother of three minor children, E.P., L.C. and Z.C., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Cortney Paige has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.P. – [REDACTED] 2009, L.C. – [REDACTED] 2012, Z.C. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Corey Baker, as next of friend and father of one minor child, H.J., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Corey Baker has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: H.J. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

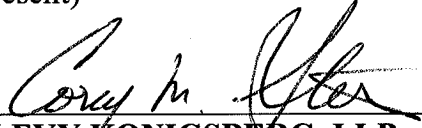
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Cora Cathey, as next of friend and mother of one minor child, J.C., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Cora Cathey has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.C. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Connell Wade, as next of friend and father of one minor child, O.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Connell Wade has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: O.W. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY-KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Clinique B- Wallace, as next of friend and mother of four minor children, A.W., E.W., J.W. and S.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Clinique B- Wallace has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.W. – [REDACTED] 2015, E.W. – [REDACTED] 2008, J.W. – [REDACTED] 2007, S.W. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

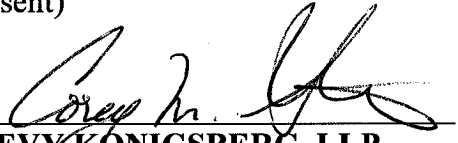
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Clifton Shultz, as next of friend and father of one minor child, B.S., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Clifton Shultz has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.S. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

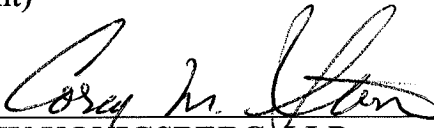
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Clara Broom, as next of friend and mother of one minor child, R.P., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Clara Broom has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.P. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cindi McBroom, as next of friend and mother of one minor child, P.G., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Cindi McBroom has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: P.G. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

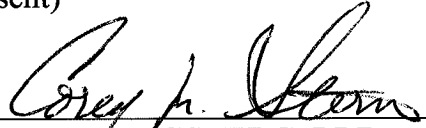
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ciara Montgomery, as next of friend and mother of two minor children, R.M. and Z.M., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Ciara Montgomery has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.M. – [REDACTED] 2011, Z.M. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cianna Batson, as next of friend and mother of two minor children, C.T. and C.R., [REDACTED] Flushing, MI 48433, claimant's counsel can be contacted at 212-605-6200. Cianna Batson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.T. – [REDACTED] 2007, C.R. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

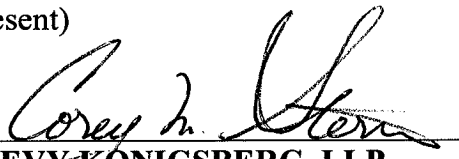
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Christopher Buzzard, as next of friend and father of one minor child, C.R., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Christopher Buzzard has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: C.R. – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Christine Keyes, as next of friend and mother of one minor child, L.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Christine Keyes has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.R. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Christina Tyler, as next of friend and mother of four minor children, A.W., J.R., K.R. and M.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Christina Tyler has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.R. – [REDACTED] 2006, K.R. – [REDACTED] 2007, M.W. – [REDACTED] 2015, A.W. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

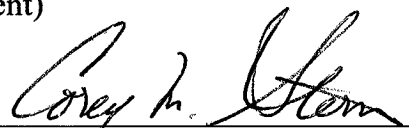
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Christina LeGrand, as next of friend and mother of one minor child, T.L., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Christina LeGrand has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: T.L. – [REDACTED] 2008
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chloe Bell, as next of friend and mother of four minor children, A.B., F.B., M.B. and O.B., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Chloe Bell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: O.B. – [REDACTED] 2011, A.B. – [REDACTED] 2013, M.B. – [REDACTED] 2015, F.B. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

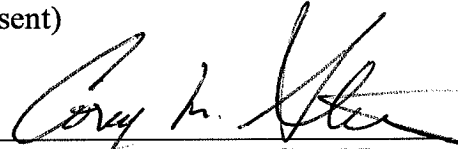
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chiquita Scott, as next of friend and mother of two minor children, O.S. and Z.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Chiquita Scott has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: O.S. – [REDACTED] 2009, Z.S. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chinika Young, as next of friend and mother of three minor children, C.Y., S.T. and Z.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Chinika Young has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.Y. – [REDACTED] 2002, S.T. – [REDACTED] 2012, Z.T. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

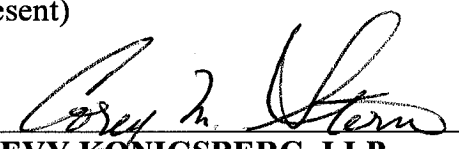
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chereese Green, as next of friend and mother of three minor children, B.G. 1, B.G. 2 and Q.B., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Chereese Green has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.G.1 – [REDACTED]2008, B.G.2 – [REDACTED]2008, Q.B. – [REDACTED]2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chevella Davis, as next of friend and mother of two minor children, A.D. and T.D., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Chevella Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.D. – [REDACTED] 2001, A.D. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chelon Daniels, as next of friend and mother of four minor children, E.S., J.S., M.S. and Q.S., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Chelon Daniels has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.S. – [REDACTED] 2014, J.S. – [REDACTED] 2006, M.S. – [REDACTED] 2011, Q.S. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Charnita Herron, as next of friend and mother of one minor child, L.H., [REDACTED] Grand Blanc, MI 48439, claimant's counsel can be contacted at 212-605-6200. Charnita Herron has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.H. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

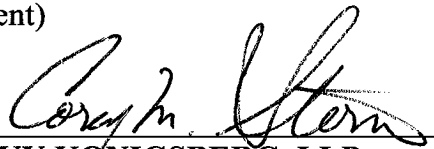
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Charley Howell, as next of friend and mother of three minor children, A.W., F.G. and R.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Charley Howell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.W. – [REDACTED] 2005, F.G. – [REDACTED] 2004, A.W. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chanuwan Brooks, as next of friend and mother of one minor child, S.M., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Chanuwan Brooks has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.M. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: ChanTelle Johnson, as next of friend and mother of one minor child, M.W., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. ChanTelle Johnson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.W. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chantal Cox, as next of friend and mother of one minor child, D.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Chantal Cox has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.C. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chameka Davis, as next of friend and mother of one minor child, P.B., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Chameka Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: P.B. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chalonda Jones, as next of friend and mother of four minor children, J.C., J.J. 1, J.J. 2 and M.L., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Chalonda Jones has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.C. – [REDACTED]2008, J.J.1 – [REDACTED]2011, J.J.2 – [REDACTED]2006, M.L. – [REDACTED]2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Chad Schlosser, as next of friend and father of two minor children, J.S. 1 and J.S. 2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Chad Schlosser has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S.1 – [REDACTED]2013, J.S.2 – [REDACTED]2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

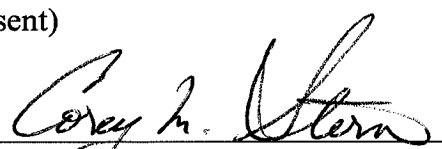
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cerone Neely, as next of friend and mother of one minor child, A.M., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Cerone Neely has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.N. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ceia Mays, as next of friend and mother of one minor child, A.K., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Ceia Mays has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.K. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cecilia Nelson, as next of friend and mother of one minor child, C.K., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Cecilia Nelson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.K. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Catiera Hill, as next of friend and mother of two minor children, C.F. 1 and C.F. 2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Catiera Hill has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.F.1 – [REDACTED]2015, C.F.2 – [REDACTED]2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

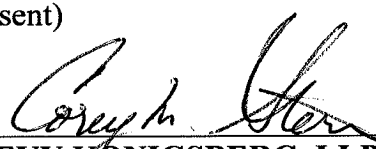
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cassidy Wade Harrison, as next of friend and mother of two minor children, A.H. and D.M., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Cassidy Wade Harrison has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.M. – [REDACTED]1999, A.H. – [REDACTED]2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cassandra Evans, as next of friend and mother of three minor children, B.E., M.E.1 and M.E.2, [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Cassandra Evans has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.E.1 – [REDACTED] 2006, M.E.2 – [REDACTED] 2006, B.E. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

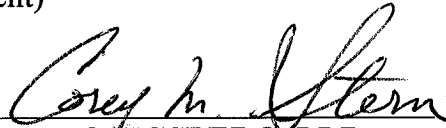
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carylynn Prescott, as next of friend and mother of two minor children, B.L. and S.A., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Carylynn Prescott has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.L. – [REDACTED] 2015, S.A. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
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- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cary Neeley, as next of friend and mother of two minor children, A.N. and S.N., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Cary Neeley has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.N. – [REDACTED] 2005, S.N. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carrie Robinson, as next of friend and mother of five minor children, C.W., K.W., S.W., S.R. 1 and S.R. 2, [REDACTED] Jacksonville, AR 72076, claimant's counsel can be contacted at 212-605-6200. Carrie Robinson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.W. – [REDACTED]2013, K.W. – [REDACTED]2012, S.W. – [REDACTED]2014, S.R.1 – [REDACTED]2010, S.R.2 – [REDACTED]2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carrie Miller, as next of friend and mother of one minor child, L.M., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Carrie Miller has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.M. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carrie Green, as next of friend and mother of one minor child, C.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Carrie Green has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.B. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carlyn Abron, as next of friend and mother of three minor children, A.A., I.A. and J.A., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Carlyn Abron has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.A. – [REDACTED] 2002, J.A. – [REDACTED] 2003, I.A. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carrie Blaisdell, as next of friend and mother of three minor children, J.H., S.H. and W.C., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Carrie Blaisdell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.H. – [REDACTED] 2002, S.H. – [REDACTED] 2000, W.C. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

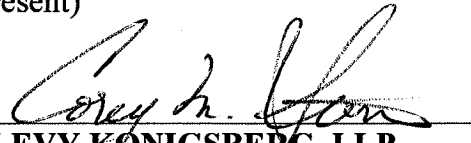
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carli Bolley, as next of friend and mother of two minor children, A.V. 1 and A.V. 2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Carli Bolley has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.V.1 – [REDACTED] 2013, A.V.2 – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Carl Hall, as next of friend and father of one minor child, C.H., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Carl Hall has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.H. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Capitola Ashley, as next of friend and mother of one minor child, J.A., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Capitola Ashley has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.D. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Candis Dixon, as next of friend and mother of two minor children, R.C. and S.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Candis Dixon has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.C. – [REDACTED] 1999, R.C. – [REDACTED] 1998

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

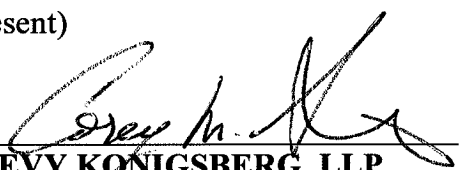
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/18/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM